# FSIS DIRECTIVE

6150.1 Rev. 1 6-19-98

# POULTRY POST-MORTEM INSPECTION AND REINSPECTION--ENFORCING THE ZERO TOLERANCE FOR VISIBLE FECAL MATERIAL

#### PART ONE--GENERAL

### I. PURPOSE

FSIS enforces a "zero tolerance" standard for visible fecal material on carcasses and carcass parts through post-mortem inspection and reinspection activities at slaughter establishments. This food safety standard also is reflected in FSIS's regulatory requirements. FSIS views preventing carcasses with visible fecal contamination from entering the chilling tank as critical to preventing the cross-contamination of other carcasses.

In early 1997, FSIS issued a final rule that clarified the Agency's zero tolerance policy for visible fecal material by explicitly requiring, in § 381.65(e), that establishments prevent poultry carcasses contaminated with visible fecal material from entering the chilling tank. The Agency issued this directive to provide instructions for an activity to determine whether establishments are complying with § 381.65(e).

FSIS subsequently published a Federal Register notice to assure that as they prepare to comply with the regulations on hazard analysis and critical control point (HACCP) systems (9 CFR part 417), establishment owners and operators are aware of FSIS's position that fecal material is a vehicle for microbial pathogens, and microbiological contamination is a food safety hazard that is reasonably likely to occur in the slaughter production process (62 FR 63254, November 28, 1997).

## II. CANCELLATION AND ISSUANCE

This directive replaces FSIS Directive 6150.1.

DISTRIBUTION: Inspection Offices; T/A Inspectors; Plant Mgt; T/A Plant Mgt; TRA; ABB; PRD, Import Offices

OPI: OPPDE

## III. REASON FOR ISSUANCE

Inspection program personnel conduct the carcass checks specified in this directive, in conjunction with other post-mortem inspection and reinspection activities, in every official establishment that slaughters any poultry (Part Two). The HACCP system regulations do

not change post-mortem inspection and reinspection. However, when they apply to an establishment, the instructions for fecal contamination checks must be modified in order to integrate this activity with other activities to verify compliance with regulatory requirements.

Therefore, FSIS has revised this directive to include a section of separate instructions for establishments that are not yet subject to the HACCP system regulations (Part Three) and establishments that are subject to the HACCP system regulations (Part Four).

The HACCP system regulations apply in official establishments as of the following dates:

January 26, 1998, in an establishment with 500 or more employees ("large establishment");

January 25, 1999, in an establishment with 10 or more but fewer than 500 employees (unless the establishment has annual sales of less than \$2.5 million) ("smaller establishment"); and

January 25, 2000, in an establishment with fewer than 10 employees or annual sales of less than \$2.5 million ("very small establishment").

### IV. REFERENCES

Regulations: §§ 381.65(e), 381.76(b)(3)(iv), 381.91(b), and 381.94(b)(2); part 417

## V. **TERMINOLOGY**

"FPS reinspection procedure" refers to the procedure for observing carcasses in Paragraph VI.B.2. of FSIS Directive 6120.1.

## VI. ADDITIONAL INFORMATION

## A. <u>Establishment Responsibilities</u>

An official establishment is responsible for assuring that its operations and procedures comply with regulatory requirements, including sanitary processing and production of poultry products to ensure that poultry products are not adulterated or misbranded. To fulfill its responsibilities, the establishment must control its processes so that (among other things) carcasses entering the chilling tank are free of visible fecal material, as required by § 381.65(e).

In an establishment not yet subject to part 417 of the regulations, the establishment is responsible for taking corrective action and instituting measures to prevent future noncompliance, as explained in FSIS Directive 8820.1.

Because fecal material is a vehicle for pathogens, and microbiological contamination is a food safety hazard that is reasonably likely to occur in the slaughter production process, a slaughter establishment that is subject to part 417 of the regulations must adopt controls that it can demonstrate are effective in reducing the occurrence of pathogens, including controls that prevent the fecal contamination of carcasses.

- o Critical control points to eliminate contamination with visible fecal material are predictable and essential components of all slaughter establishments' HACCP plans.
- o Initial validation of a HACCP plan for slaughter and monitoring thereunder, as verified and documented in establishment records, must demonstrate the effective operation of the plan's controls on a continuing basis.

(§§ 417.2(a)-(c), 417.3(a), 417.4, and 417.5. See 62 FR 63255.)

## B. Inspection Program Responsibilities

This directive does <u>not</u> affect the disposition of poultry carcasses during post-mortem inspection and reinspection (§§ 381.76 and 381.91). It provides instructions for conducting an additional activity to determine whether official establishments are complying with § 381.65(e).

## PART TWO--ALL SLAUGHTER ESTABLISHMENTS

## I. IDENTIFICATION OF FECES

To determine whether an establishment is preventing poultry carcasses with visible fecal material from entering the chilling tank (as required by § 381.65(e)), inspection program personnel who examine carcasses must properly identify feces.

Three factors--color, consistency, and composition--are essential in identifying fecal material on the inside or outside of poultry carcasses.

- o The color of feces ranges from varying shades of yellow to green, brown, and white.
- o The consistency of feces is characteristically semi-solid to a paste.
- o The composition of feces may or may not include plant material.

Inspection program personnel must take care to distinguish feces from ingesta.

- o The color of ingesta varies with the diet.
- O The consistency of ingesta is characteristically solid or granular; digestive fluids sometimes are present.
- o The composition of ingesta is identifiable plant material.

(Section 381.65(e) does not apply to ingesta. However, inspection program personnel who find ingesta during fecal contamination checks should notify establishment management to remove ingesta from affected carcasses.)

## II. FECAL CONTAMINATION CHECKS

## A. <u>General</u>

In each establishment slaughtering poultry, in conjunction with other post-mortem inspection and reinspection activities, inspection program personnel are to perform fecal contamination checks as instructed in this directive.

# B. <u>Carcass Selection and Examination</u>

A fecal contamination check is the selection and examination of 10 poultry carcasses, after the final wash and before the chilling tank, as described in this Paragraph II.B.

- 1. Inspection program personnel are to:
- o select 10 carcasses randomly (using an established FSIS method), and
- o examine the selected carcasses off line, at either--

the same location as prechill testing, in an establishment inspected under the finished product standards (§  $381.76(b)(3)(iv)(\underline{d})(\underline{ii})$ ), or

the inspection station where Acceptable Quality Level (AQL) testing is conducted, in another establishment (traditional inspection).

- 2. Inspection program personnel are to check for visible fecal material, using the 4-step FPS reinspection procedure, as follows:
  - Outside back. While holding the carcass, with the back of the carcass toward the observer and starting at the hock area, observe the hocks, back part of

the legs, tail area, back of the carcass, and top side of the wings.

- Outside front. Turn the carcass and observe the bottom side of the wings, breast, and front part of the legs.
- o Inside. Observe the inside surfaces of the carcass and the abdominal flaps and fat.
- o Neck flap area. Observe the neck flap and the thoracic inlet area.

# PART THREE--SLAUGHTER ESTABLISHMENTS NOT SUBJECT TO THE HACCP SYSTEM REGULATIONS

#### I. REFERENCES

FSIS Directive 8800.2 FSIS Directive 8820.1 FSIS Form 8800-2, Inspector Assignment Schedule

#### II. TERMINOLOGY

DCG-- Deficiency Classification Guide
(Attachment 1 to FSIS Directive 8820.1, Rev. 2)
ISG-- Inspection System Guide (FSIS Directive 5400.1)
PDR-- Process Deficiency Record, FSIS Form 8820-2
(Attachment 2 to FSIS Directive 8820.1)

## III. FECAL CONTAMINATION CHECKS

#### A. <u>General</u>

The ISG addresses checks for compliance with § 381.65(e) in task 03E01a1/a2 under sanitary dressing (Process 03E).

- 1. During each shift, inspection program personnel are to conduct at least two fecal contamination checks on each evisceration line.
- 2. Inspection program personnel are to use task code 03E01a1/a2 to document performance of each fecal contamination check on the Inspector Assignment Schedule.

## B. Results

# 1. <u>No noncompliance findings</u>

Inspection program personnel who find no visible fecal material on checked carcasses are to mark the Inspector Assignment Schedule to indicate performance of the task. (Take no further action.)

# 2. <u>Noncompliance findings</u>

Inspection program personnel who find any visible fecal material during a 10-bird check under this directive are to classify and document the deficiency on one PDR and take other action, as set out below and as appropriate under FSIS Directives 8800.2 and 8820.1.

- a. Immediately notify establishment management verbally of the fecal contamination finding and the establishment's responsibility for taking immediate corrective and preventive action(s).
- b. Verify the effectiveness of the establishment's immediate corrective action by conducting a retest for fecal contamination approximately 10 minutes after notifying establishment management of the fecal contamination finding.
  - O Using the procedure in Part Two, Paragraph II.B., check another 10 carcasses from the same evisceration line as the one that resulted in a finding of fecal contamination.
  - o If visible fecal material is found in the retest, carcasses from the affected evisceration line should not enter the chilling tank until establishment management has restored process control.

# PART FOUR--SLAUGHTER ESTABLISHMENTS SUBJECT TO THE HACCP SYSTEM REGULATIONS

#### I. REFERENCES

FSIS Directive 5000.1 FSIS Directive 5400.5

#### II. TERMINOLOGY

ISP-- inspection system procedure(s), as compiled in
 the ISP Guide (Attachment 8 to FSIS Directive 5400.5)

NDG-- Noncompliance Determination Guide
(Attachment 5 to FSIS Directive 5400.5)

NR-- Noncompliance Record, FSIS Form 5400-4 (Attachment 3 to FSIS Directive 5400.5)

PS-- Procedure Schedule, FSIS Form 5400-3A
(Attachment 2 to FSIS Directive 5400.5)

## III. FECAL CONTAMINATION CHECKS

## A. General

The ISP Guide (which, at this time, does not include Line Slaughter procedures) addresses verification of compliance with § 381.65(e) as a component of ISP procedure 03J01, the ISP slaughter procedure that inspection program personnel perform, along with ISP procedure 03J02, to verify the adequacy of an establishment's HACCP plan(s).

- 1. Each day, inspection program personnel are to conduct at least two fecal contamination checks for each evisceration line for every shift (<u>i.e.</u>, the number of checks will total at least 2 x number of shifts x number of lines).
- 2. Inspection program personnel are to document the performance, and follow-up on the results, of fecal contamination checks along with other components of ISP procedure 03J01. (I.e., treat the results as the results of a single procedure on the PS and, when applicable, the NR.)

### B. Results

# 1. <u>No noncompliance findings</u>

Inspection program personnel who find no visible fecal material on checked carcasses are to mark the PS to indicate performance after completing all components of the procedure.

## 2. Noncompliance findings

Inspection program personnel who find any visible fecal material on checked carcasses are to document and follow-up on the noncompliance as instructed in FSIS Directive 5400.5 and this Paragraph III.B.

- a. The "monitoring" trend indicator applies to this noncompliance finding. (See the NDG for which trend indicator to use when other noncompliance is found during performance of ISP procedure 03J01.) FSIS also will utilize findings of noncompliance with § 381.65(e) in considering establishment performance for purposes of the frequency and timing of FSIS testing for <u>Salmonella</u> (§ 381.94(b)(2)).
- b. Immediately notify establishment management verbally of the fecal contamination finding and the applicability of § 417.3 (the requirements for corrective action).
- c. Perform ISP procedure 03J02. Determine whether the establishment takes corrective action, as required by § 417.3. Focus on the lot or shipment in which one or more contaminated birds were found.

As to the § 381.65(e) component of the procedure, the objective is to determine whether sanitary dressing critical control points (as monitored by the establishment to ensure associated critical limits are met) are adequate to prevent noncompliance with the zero tolerance standard. The HACCP plan, in operation, must prevent poultry carcasses contaminated with visible fecal material from entering the chilling tank), as verified and documented by the establishment (§§ 417.2(c), 417.4(a), and 417.5(a), (b), and (c)). (See FSIS Directive 5000.1, Part Two, Paragraphs III.B. and III.C.)

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